

EETD

On-Site Hands-on Work Safety Process for Subcontractors (Non-Construction)

Overview

For **on-site hands-on work** (non-construction) activities performed by subcontractors, vendors and guests, a Subcontractors Job Hazards Analysis & Work Authorization (**SJHAWA**) must be completed (unless a regular JHA has been completed instead). It is the requester's responsibility to assure the SJHAWA documentation is completed and the process is followed.

Process Application

Applies to: <ul style="list-style-type: none">• All hands-on work performed at LBNL facilities by non-construction subcontractors, vendors & guests who are not under direct supervisory control of Laboratory personnel• Subcontractors typically working at Lab less than 30 days/year who do not have an employee number or badge; if working more than 30 days/year, subcontractor typically completes a regular JHA• <i>May apply to hands-on work performed at a field site; contact EETD Safety Coordinator for guidance</i>	Does not apply to: <ul style="list-style-type: none">• Consultants, personal services agreements, R&D subcontractors, Intra University Transactions, ALS Users and other university agreements• Subcontractors who are performing all the work at a non-LBNL facility• Subcontractors, vendors or guests who have completed a regular JHA
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Hands-On Work Definition

Hands-on work includes: <ul style="list-style-type: none">• Use of hand or power tools• Repair or service of a device, apparatus, machine or mechanism• New equipment set up and testing• Handling and/or disposing of materials e.g., chemicals, compressed gases, radioactive or bio-hazardous substances.	Hands-on work excludes: <ul style="list-style-type: none">• Office and administrative duties• Computer programming• Attending or making a presentation• Supervision of a worker who is not performing hands-on work• Photography• Courier or taxi services
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Process

Process Summary: <ul style="list-style-type: none">• Requester completes Requester portion of SJHAWA form; Requisition Preparer submits SJHAWA with purchase requisition to Procurement; Procurement submits to Subcontractor; Subcontractor completes remainder of form• Requester holds in-person pre-job meeting with subcontractor, which can occur immediately before the subcontractor performs the work. Meeting components:<ul style="list-style-type: none">○ Requester & vendor jointly review SJHAWA & EH&S Orientation○ Vendor completes General Employee Radiation Training (GERT) training○ Vendor signs and dates SJHAWA○ Requester determines work hazard level, then signs SJHAWA to authorize work• Requester provides oversight of subcontractor's work adequate to work hazard level, records oversight activities on last page of SJHAWA, sends copy of oversight document to EETD Safety Coordinator• SJHAWA is valid for one year from the date completed, provided scope remains the same
Detailed Process Instructions: Requester, requisition preparer, and subcontractor follow and complete all steps for the applicable situation outlined in "Guidance for Performing the Non-Construction Safety Assurance Process" located at: http://www.lbl.gov/ehs/ssa/assets/docs/nssa/Guidance_for_Performing_Non-Construction_Safety_Assurance_July_2.pdf

Responsibilities

Requester is responsible for completing and approving the SJHAWA and for ensuring that the subcontractor's GERT training is complete. Approval of the SJHAWA and GERT completion may be done prior to, or during the Pre-Job Meeting, but must be completed before the subcontractor can perform work. Requester oversees work, completes oversight log in SJHAWA, and submits original or a copy of complete SJHAWA (including log) and GERT training confirmation to EETD Safety Coordinator.
Requisition Preparer is responsible for confirming with Requester whether a SJHAWA is necessary when preparing a new requisition and for ensuring Requester completes appropriate section of SJHAWA before submitting requisition to Procurement.
EETD Safety Coordinator is responsible for retaining all SJHAWAs in central location for reference and future use.
Subcontractor is responsible for reviewing EH&S Orientation, completing SJHAWA & GERT, and performing work according to LBNL policies and procedures.